

# ES&H SYNERGY

DOE/EH-0487-2

## Update on EH Orders Reduction Process Improvement Team

EH has met the National Performance Review challenge to reduce the number of directive requirements by 50 percent. At last count in mid-1995, the Process Improvement Team had reduced the number of requirements from 5,000 to several hundred, condensing over 40 EH Orders into 9 new ones. EH achieved this dramatic reduction by stating goals and listing mandatory requirements for *what must be done*, and leaving the *how to get it done* to lower-level documents such as implementation guides and technical standards. The revised EH Orders also eliminated redundant and conflicting requirements.

All the new Orders have been approved and published. They will be distributed to directives contacts in the field and HQ. The new Orders can be accessed electronically via DOE Local Area Networks on the Directives Bulletin Board or on the Internet at <http://www.hr.doe.gov>.

The team also compared old requirements with new ones to determine whether the old requirements were placed in a new Order, moved into a guidance document or technical standard, or deleted. Bud Danielson, coordinator for the team, advises that contractor and DOE personnel should review interim policy statement P.450.2 (10/6/95), Identification, Implementation, and Compliance with Environment, Safety and Health Requirements, before transitioning from the old to new requirements. This interim policy statement is being revised. Contracting Officers should review this policy statement prior to revising contract terms and conditions to add the new EH Orders. For more information, contact Bud Danielson (EH-31) at (301)903-2954.

## METC Captures First Fossil Energy ES&H Achievement Award

Congratulations to the Morgantown Energy Technology Center's (METC) Environment, Safety and Health (ES&H) Committee for capturing the first Office of Fossil Energy (FE) ES&H Achievement Award! METC established the "Caught-in-the-Act" Safety Award Program which is a unique safety program that empowers employees to immediately reward their peers for safe actions or ideas. Assistant Secretary for Fossil Energy, Patricia Fry Godley, and Assistant Secretary for Environment, Safety and Health, Tara O'Toole, presented the award to the METC ES&H Committee at an award ceremony on October 19, 1995 in Washington, D.C.

The Office of Fossil Energy established the ES&H Achievement Award in early 1995 in an effort to recognize initiatives within FE that contribute to the safety and health of coworkers and the public and protection of the environment, and acknowledge those individuals or team efforts in creating these projects. Initiatives such as the METC "Caught-in-the-Act" Safety Award Program are beneficial to Fossil Energy in that they are creating a new way to look at ES&H within FE by creating a work force that incorporates ES&H in its daily routine, resulting in a safer workplace. For more information, contact Trudy Transtrum (FE-6) at (202)586-7253.



From left to right: Craig Zamuda, Director, Office of Self-Assessment, Fossil Energy, Paul Wieber, METC, Tara O'Toole, Assistant Secretary for Environment, Safety and Health, Patricia Fry Godley, Assistant Secretary for Fossil Energy.

# In this Issue . . .

## Greetings To Our Readers

As you read this Winter edition of *ES&H Synergy*, the Editorial Team is busily gathering items of interest and concern for the next issue. We value the partnership that has developed with you, our readers and contributors, and hope you will continue to tell us about your safety experiences, health or environmental lessons you have learned, the new technologies, techniques, and processes you have used that can be implemented in other DOE facilities to make them safer. You, our colleagues, play an important role in making *Synergy* relevant and timely. The *Synergy* team will continue to be within your reach and we will cover those issues that are important and are of concern to you.

Please continue to make us aware of your successes, new initiatives and upcoming events in your areas. We look forward to providing you with information relevant to environment, safety and health.

**R. Stephen Scott, Executive Editor**

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## ES&H SYNERGY

*ES&H Synergy* is a quarterly newsletter published by DOE's Office of Environment, Safety and Health (EH) to promote awareness and information exchange of all environment, safety, and health issues impacting DOE personnel and contractors. Each issue highlights Headquarters and field initiatives in environment, health physics, nuclear and facility safety, occupational medicine, and occupational safety and health. To be added to the distribution list or to receive a copy of this publication, call 1-800-473-4375. *Synergy* is also available electronically through Technical Information Services (TIS) or via Internet.

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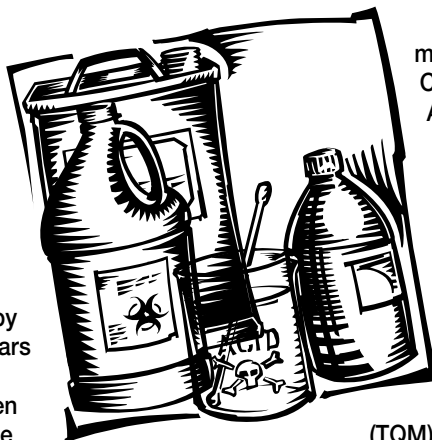
# DOE and Chemical Industry Will Work Together to Improve ES&H

A unique Memorandum of Understanding (MOU) to improve ES&H performance has been developed by DOE and the Chemical Manufacturers Association (CMA). The MOU, which will be signed shortly by Secretary O'Leary and Fred Webber, President and Chief Executive Officer of CMA, centers on CMA's Responsible Care® Program, an ES&H performance improvement initiative that has been implemented by the U.S. chemical industry for the past 7 years and has been adopted internationally by chemical industries in more than three dozen countries. The MOU will allow DOE to utilize the Responsible Care® tools and techniques for the continued improvement of ES&H programs within DOE.

The Responsible Care® initiative was developed by the 180 member companies of CMA in response to public concerns about the safety of the chemical industry following the accident which occurred in Bhopal, India in 1984. After completion of its chemical vulnerability study in 1994, DOE began discussions with CMA to examine the Responsible Care® Program as a way to access the chemical industry's ES&H improvement activities and to help DOE address its own chemical vulnerabilities.

At the heart of Responsible Care® are six Codes of Management Practices, written by industry experts as performance-oriented goals for achieving best practices in Employee Health and Safety, Process Safety, Pollution Prevention, Distribution, Community Awareness and Emergency Response, and Product Stewardship. While written specifically to address ES&H issues associated with chemical manufacturing operations, the codes of Responsible Care® have broad applicability for anyone using, handling or disposing of chemicals and chemical wastes, including DOE's contractors and national laboratories. These codes are also broad enough to be applicable to any hazardous operation including DOE cleanup activities.

Both the overall performance-oriented nature of the Responsible Care® initiative, as well as the management practices contained in its Employee Health and Safety Code and Process Safety Code, are compatible with the intent of the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Program (VPP). This compatibility is evidenced by the many CMA



member companies that both practice Responsible Care® and maintain VPP Star Program Status. Although the strong environmental emphasis of Responsible Care® makes the initiative broader in scope than VPP, the compatibility of Responsible Care's® health and safety components with VPP makes it possible to view the initiative as an environmentally augmented approach to VPP, perhaps a "VPP-Plus" program.

Pivotal to the success of any program, e.g. VPP, International Standards Organization (ISO) 9000 and Total Quality Management (TQM) are strong top management commitment and leadership programs that utilize working-level input and an active mutual assistance network. Mutual assistance at all levels allows company members to benchmark ES&H progress and share lessons learned. The MOU will provide DOE direct access to all Responsible Care® resource materials (implementation manuals and booklets, newsletters, videotapes), as well as providing designated individuals direct access to the mutual assistance network. The mutual assistance network includes opportunities to participate in national and regional workshops, seminars and meetings with a broad range of industry counterparts, and access to an interactive electronic bulletin board. DOE, in turn, will draw appropriately upon the principles of Responsible Care® to inform its contractors of Responsible Care®, and provide feedback to CMA regarding its experiences in adapting Responsible Care® principles for use in its own ES&H programs.



Since spring, four sites have requested in-depth senior management briefings on Responsible Care®. The EH-arranged briefings featured CMA experts on the initiative and were held at Rocky Flats, Oak Ridge, Richland, and Savannah River. These sites are all in the process of examining the applicability of Responsible Care® principles and practices to their operations and how the initiative may help to enhance the effectiveness and efficiency of ES&H program improvements planned or underway.



Pilot projects for enhancing existing ES&H programs through adaption of Responsible Care® are anticipated at one or more of the four sites mentioned above. Richland has already decided to pilot several portions of the program. EH's responsibility will be to facilitate access to the CMA resources and networks available through the MOU and provide "hands on" assistance, as needed, during the start-up phase of the pilots.

DOE has also become a sponsoring member of the Center for Chemical Process Safety (CCPS) which was created by the American Institute of Chemical Engineers. As a sponsor, DOE is participating in the development of ES&H tools and publications that will enhance safety at chemical facilities. For more information about the Responsible Care® program or CCPS activities, contact Robert Barber (EH-53) at (301)903-3477.

# DOE Makes Significant Changes to NEPA Program

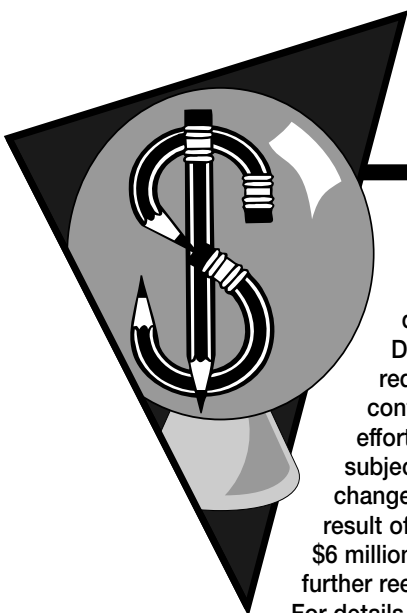
As part of continuous improvement in the DOE National Environmental Policy Act (NEPA) Program, the Office of NEPA Policy and Assistance (EH-42) has taken further steps to make the DOE NEPA process more efficient. The most recent accomplishments include revising and streamlining the NEPA Order, preparing a proposed rule to amend DOE's NEPA procedures, and developing new NEPA workshops.

In issuing the revised NEPA Order, EH has achieved another milestone under Strategic Alignment Initiative 29 — part of the plan to save \$26 million over 5 years in the Department's NEPA compliance program. The new "NEPA Order" (DOE Order 451.1), the *National Environmental Policy Act Compliance Program*, issued September 11, 1995, documents the internal responsibilities for implementing the DOE NEPA program. The Office of NEPA Policy and Assistance worked extensively with other headquarters and field elements to develop consensus on the new Order. Many of the changes between DOE Order 451.1 and its predecessor (DOE Order 5440.1E), known by the same name, reflect the June 1994 Secretarial NEPA Policy. Additional changes are consistent with the aim of the Secretarial policy to make the DOE NEPA process work better and cost less; to streamline or eliminate procedures, or increase the NEPA authority of field and program decision makers. These changes eliminate documentation requirements for categorical exclusions, place categorical exclusion determination authority with NEPA Compliance Officers, and eliminate the requirement that the Secretary approve all site-wide and programmatic environmental impact statements. The order also places environmental impact statement determination authority with Heads of Field Organizations and Secretarial Offices and eliminates the Monthly Report to the Secretary on NEPA Documents.

The Office of NEPA Policy and Assistance also has prepared proposed changes to DOE's NEPA regulations, 10 CFR Part 1021, based on suggestions from program and field elements. Proposed changes would include new and expanded categorical exclusions and removal of outmoded existing categorical exclusions. Other changes being considered would make an environmental impact statement implementation plan optional rather than required, and simplify the required content for findings of no significant impact and the process for publicizing records of decision. The office has initiated the required consultation with the Council on Environmental Quality, in preparation for publishing a notice of proposed rulemaking in the *Federal Register*.

Since January 1995, the Office of NEPA Policy and Assistance has been conducting a new series of NEPA workshops at DOE offices throughout the country. As of October 1995, over 300 DOE and contractor staff have attended NEPA workshops at Savannah River, Albuquerque, Oak Ridge, Rocky Flats, Ohio (Mound and Fernald), Oakland, and Headquarters. The NEPA workshops cover five standard modules: an overview of the NEPA program; NEPA Regulations and the DOE Order; the NEPA process; document preparation; and an environmental assessment exercise. Sessions also are offered on specific topics ranging from environmental justice to *Federal Register* document preparation. Workshops are tailored (both in the modules presented and in the content of each module) according to the needs of each office. Future workshops may use video techniques and modules that focus on more specialized topics (e.g., wetlands). The tentative winter schedule includes sessions for the Chicago, Idaho, Nevada, and Richland Operations Offices, the Amarillo Area Office, and the Yucca Mountain Project Office.

Additional information may be obtained from the Office of NEPA Policy and Assistance (EH-42) at (202)586-4600, from Yardena Mansoor (NEPA Order), John Pulliam (DOE NEPA Regulations), and Linda Thurston (NEPA Workshops).



## New Occurrence Reporting Requirements Lead to Major Savings

Occurrence Reporting and Processing System (ORPS) users can expect major cost savings thanks to changes in the occurrence reporting requirements found in the new DOE Order 232.1, "Occurrence Reporting and Processing of Operations Information." ORPS is the computerized system used for reporting occurrences at DOE sites, analyzing DOE's performance, and developing lessons learned to prevent recurrence of incidents. The new Order, which replaced DOE Order 5000.3B on October 30, 1995, eliminates unnecessary reporting, raises reporting requirement levels without sacrificing the reporting of significant safety events, and corrects conflicts with other DOE Orders. These changes to the Order were made through a collaborative effort by members of the DOE-wide Occurrence Reporting Special Interest Group and Headquarters subject matter experts based on over 1,000 comments received from ORPS users. The resulting changes were then promulgated at meetings and teleconferences held at each major DOE site. As a result of the changes, DOE-wide occurrence reporting costs are expected to decrease 28 percent, about \$6 million of an estimated annual cost of \$20 million. Seeking to be even more cost effective, EH will further reengineer ORPS during the Winter of 1995-96 to achieve additional time and cost savings. For details, contact Eugenia Boyle (EH-33) at (301)903-3393.

# OSHA Construction Standards

On the recommendation of the Advisory Committee on Construction Safety and Health, OSHA created a single 29 CFR

1926 document in 1994 that includes all construction-related standards. That is, current OSHA construction standards listed under 29 CFR 1926

now include specific citations from the general industry standards (29 CFR 1910) appli-

cable to construction. It appears, however, that a decision may be made to reduce the pages of standards and to return to the previous method of publishing OSHA construction standards. This means that if you want all construction-related standards, you would need *both* 29 CFR 1910 and 29 CFR 1926 documents.



# Oversight Transition

Two initiatives provided for under the July 1995 DOE/OSHA Memorandum of Understanding (MOU) have begun: (1) An independent study of issues related to moving enforcement responsibility from DOE to OSHA, (2) An OSHA enforcement pilot program at a DOE facility. A DOE-OSHA Transition Team developed a draft implementation plan for the pilot, which was presented to DOE's Tara O'Toole and OSHA's Joe Dear this winter. The plan's objective is to implement a pilot at a DOE site located in a state with Federal OSHA jurisdiction.

## RESRAD Codes Used to Evaluate Cleanup Activities Save Sites Money and Time

Many federal and state agencies have used RESRAD, an acronym for the RESidual RADioactive material guideline code, to help establish guidelines for cleanup levels at radiologically contaminated sites. This computer code evaluates radiologically contaminated sites using the pathway analysis method to help answer the following questions related to residual contamination:

- Is there any risk of concern?
- What is the magnitude of risk?
- What is the uncertainty of risk?
- What are tolerable concentrations?

From these questions, RESRAD codes are used in both pre-cleanup and post-remediation assessments of dose/risk. More specifically, the codes are used in assessing risks to human health and ecological systems that arise from different residual contamination situations; in deriving cleanup criteria based on target risk limit or dose limits; and for establishing a consistent methodology for contaminant transport and dose/risk assessment.

Additional RESRAD "family codes" exist or are in development to more accurately establish risks related to other forms of contamination. RESRAD-CHEM assesses risks resulting from exposure to hazardous chemicals, RESRAD-BUILD evaluates radiological contamination in buildings, RESRAD-RECYCLE estimates doses from radionuclides in scrap metals, RESRAD-

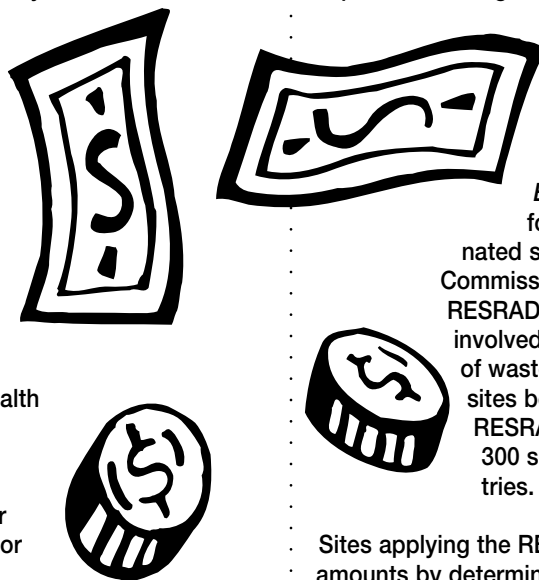
BASELINE follows Environmental Protection Agency risk assessment guidance for Superfund cleanups to calculate radiological doses and risks during baseline risk assessments, and RESRAD-ECORISK surveys contamination risks of various aspects of ecological systems.

A number of accomplishments can be attributed to the RESRAD codes. Most notably, RESRAD is the only code specifically approved in DOE Order 5400.5, *Radiation Protection of the Public and the Environment* and 10 CFR 834, (same title), for the evaluation of radioactively contaminated sites.

Further, the Nuclear Regulatory Commission (NRC) has approved the use of RESRAD codes for dose evaluation by licensees involved in decommissioning, NRC staff evaluation of waste disposal requests, and dose evaluation of sites being reviewed by NRC staff. Finally, the RESRAD model has been applied to more than 300 sites in the United States and other countries.

Sites applying the RESRAD codes can save significant dollar amounts by determining prior to remediation the extent of the cleanup needed. RESRAD can also help establish the most efficient methods for the remediation task.

For information regarding RESRAD, contact Dr. Charley Yu at the Radiological Health Risk Section of the Environmental Assessment Division at Argonne National Laboratory, phone (708)252-5589 or e-mail [YUC@SMTPLINK.EID.ANL.GOV](mailto:YUC@SMTPLINK.EID.ANL.GOV).



# Lessons Revealed in Report on Integrated Safety and Health Approach for D&D Activities

Are you involved in decontamination and decommissioning (D&D) activities at DOE sites? Then you will want to read a recent report that describes the integrated safety and health approach and lessons learned identified during EH technical assistance to the Hanford Plutonium-Uranium Extraction (PUREX) Facility deactivation project. In 1993, EH formed a technical partnership with the Office of Environmental Management (EM), the Richland Operations Office (RL), and the Westinghouse Hanford Company (WHC) for the specific purpose of providing efficient and effective safety and health support through an integrated approach. The report, entitled, *Integrating Safety and Health During Facility Deactivation with Lessons Learned from PUREX*, emphasizes and discusses the importance and mechanics of integrating safety and health during work planning and execution—issues that face all DOE D&D and other cleanup activities.

As a guide, the report can help project managers apply key strategies that can have significant safety and health impacts. These strategies, or integrated approach objectives, include applying a graded approach to hazard analysis and using a multi-disciplinary team of managers, workers, and safety and health professionals during work planning, engineering, and work execution.

But, does this integrated approach really work? According to the report, it already has. Application of the approach during the PUREX deactivation project produced several measurable and validating results:

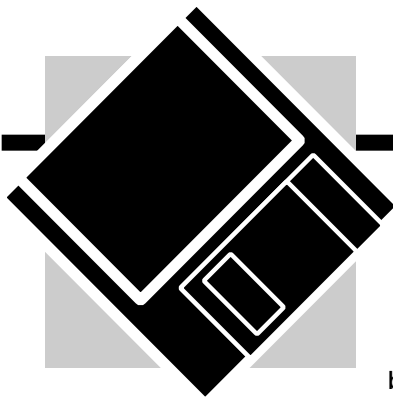


*Nitric Acid Removal Dry-Run.*

- The average lost workday case rate dropped from 3.8 in October 1993 (before the project) to 1.6 in 1994.
- In the last 2 years, no lost workday cases were reported in more than 900,000 labor hours, resulting in savings of about \$340,000.
- Westinghouse estimated saving \$500,000 (about 9,000 labor hours) by avoiding expensive upgrades to safety documents.
- Graded approaches to hazard analysis resulted in a more thorough hazard evaluation and reduced the resource commitment to hazard analysis activities.
- Increased worker involvement in safety and health activities boosted employee morale and increased worker safety awareness.

Experience has shown that the keys to strong safety and health programs are management commitment to safety and workers who are tangibly involved in their safety programs. The integrated safety and health approach developed at PUREX goes a long way toward achieving these goals.

For questions about the related project or to obtain a copy of the report, contact Tony Eng (EH-53 D&D Project Manager) by phone at (301)903-4210 or e-mail at [tony.eng@hq.doe.gov](mailto:tony.eng@hq.doe.gov).



## SHIMS Software Reduces Workload

Pacific Northwest Laboratory's (PNL) Safety and Health Information Management System (SHIMS) software manages records of occupational injuries or illnesses, and motor vehicle and property damage accidents from initial reporting by line managers through review and case closure. SHIMS also manages and

eliminates redundant data entry that was required to maintain both OSHA and DOE records.

Since its implementation in January 1995, SHIMS has significantly reduced the workload of ES&H accident investigators and provided direct view and print access to accident information for line managers and worker compensation staff. Other benefits include automatic electronic mail to remind line managers, investigators, and reviewers of cases for which they are responsible, and ad-hoc reporting capabilities for trend analysis. For details, contact Scott Nikodym (PNL) at (509)376-0713.

produces the OSHA 200 Log and Summary of Occupational Injuries and Illnesses forms-OSHA 101 and DOE CAIRS forms-and standard safety performance reports. Human resources data, hours worked, and building information are electronically collected from other PNL information systems, which significantly reduces overall data entry, increases recordkeeping accuracy, and simplifies report generation. This system

# Update on RCRA and CERCLA Reform

Ongoing reform efforts in both the regulatory and legislative arenas may have a significant impact on the Department's waste management and environmental restoration programs. Although the outcomes of these legislative and regulatory developments are uncertain, the significant initiatives currently under consideration can be explained.

Two key statutes, the Resource Conservation and Recovery Act (RCRA) and the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), are being considered for reauthorization. Under CERCLA, land use as it relates to the risk assessment process has received considerable attention as has the burgeoning costs of CERCLA remedies. To reduce cleanup costs, a number of proposals are being considered: (1) requiring analysis of the cost benefits of remedial action alternatives; (2) restricting state imposition of requirements more stringent than Federal requirements; (3) allowing for funds transfer between cleanup programs; and, (4) placing limits on natural resource damages.

Another issue important to the Department is the encouragement of innovative technology, either by streamlined permitting, indemnification reform, deferred remediation, or combinations thereof. Other issues with ramifications to the Department pertain to more state involvement, such as authorizing the states to oversee Superfund programs, moving sites from the National Priorities List (NPL) to state RCRA programs, and allowing states to veto addition of sites to the NPL. Some of these issues have recently been addressed by the Environmental Protection Agency (EPA), which has announced several administrative reforms to the Superfund Program.

In a May 1995 EPA Directive, "Land Use in the CERCLA Remedy Selection Process" (OSWER Directive No. 9355.7-04), EPA indicated that remedial action objectives developed during the remedial investigation/feasibility study (RI/FS) should reflect the "reasonably anticipated future land use." The future land use assumptions will allow the baseline risk assessment and feasibility study to focus on developing practicable and cost effective remedial alternatives which should lead to site activities that are consistent with the future land use.

EPA also has announced several other reforms to control cleanup costs and promote cost-effectiveness. These include:

- Establishing cost-effectiveness thresholds and "rules of thumb" to guide a new EPA National Remedy Review Board to review certain high cost remedies.
- Limiting revisitation of remedies at certain sites when significant new information becomes available.
- Interpreting the role of cost in significant program guidances, such as for land use, ground water, and presumptive remedies, to assure cost-effectiveness.
- Clarifying information regarding remedy selection decisions by requiring a summary sheet clearly demonstrating the basis for remedy selection at each site by presenting the relationship between site risks and response actions, including the costs and benefits of cleanup alternatives.

Under RCRA, initiatives are under way in several areas including:

- **Corrective actions** — A proposal seeking alternatives to the full permitting approach for remediation waste or corrective actions have been made.
- **Land disposal restrictions (LDRs)** — Proposals are underway to eliminate unnecessary treatments based on a decision involving risk or migration.
- **Recycling** - Proposals are also being considered to accommodate recycling either as a new subtitle under RCRA, by excluding it from Subtitle C without creating a new Subtitle, or by regulating it under Subtitle C via promulgated standards or a permitting approach.
- **Integration with other statutes** — EPA is considering proposals to decline regulation under RCRA if the regulated matter is covered by another statute (e.g., certain mixed waste also subject to the Atomic Energy Act).

On the forefront of the regulatory initiative, EPA is proposing significant new rules that will affect DOE in significant ways.

- **Hazardous Waste Identification Rule (HWIR)** EPA is currently developing two separate HWIR proposals. The first proposed rule will address process wastes and will establish constituent-specific exit levels for low risk listed hazardous wastes (below which the waste would not be subject to the RCRA hazardous waste regulations). EPA expected to issue this proposal by November 13, 1995. A second HWIR proposal will include requirements applicable to the management of contaminated media generated from remediating hazardous waste sites. EPA currently intends to issue this proposed rule in early 1996.
- **Land Disposal Restrictions (LDR)** The EPA also is actively developing two rulemakings to amend the LDR program. These rules are referred to as the LDR Phase III and Phase IV rules. In the LDR Phase III rule, which was proposed in March 1995 (60 FR 11702, March 3, 1995), EPA suggested end-of-pipe treatment standards for characteristic hazardous wastes managed in Clean Water Act (CWA) and equivalent treatment systems. This proposed rule addresses various revisions to the existing LDR program including a prohibition on the burning of inorganic metal-bearing hazardous wastes. EPA plans to issue the LDR Phase III final rule in January 1996. In August 1995, EPA published the LDR Phase IV proposed rule (60 FR 43654, August 22, 1995). Among other things, this proposed rule includes treatment standards for toxicity characteristic metal wastes. In addition, the proposed rule addresses issues regarding the equivalency of treatment in wastewater treatment systems subject to CWA regulations to treatment required under RCRA. A final rule is planned by June 1996.

*Continued on page 8*

# The Office of Environmental Policy and Assistance Opens New INTERNET Web Site

The Office of Environmental Policy and Assistance (OEPA), has announced the availability of their new Web Site on the INTERNET. The new Web Site links the OEPA mission, functions and technical capabilities, and may be accessed by using URL address: <http://www.eh.doe.gov/oepa>. Many of the environmental guidance documents developed by OEPA are available for local viewing and printing from the Web Site, with more to be added as available funds permit. For more information on the OEPA Web Site, contact Katherine Nakata (EH-413) at (202)586-0801, fax (202)586-3915, or e-mail [katherine.nakata@hq.doe.gov](mailto:katherine.nakata@hq.doe.gov).

(Editor's Note: The OEPA Web Site may also be accessed through the ES&H Technical Information Services (TIS) Web Site. The URL for TIS is <http://tis.eh.doe.gov>.)



## Update on RCRA and CERCLA Reform continued from page 7

- **RCRA Corrective Action (Subpart S)** In 1990, the EPA proposed 40 CFR 264 Subpart S, which would establish requirements for conducting remedial investigations and evaluating and implementing remedies at RCRA facilities. EPA finalized a portion of Subpart S in 1993 (Corrective Action Management Units and Temporary Units; Corrective Action Provisions; Final Rule, 58 FR 8658, February 16, 1993). Remaining portions of Subpart S are currently used as guidance by States and EPA regions in implementing corrective action. As a consequence of EPA initiated and other regulatory reform efforts to improve corrective action processes, EPA is revising its approach to corrective action in order to expedite cleanups in a more cost effective manner. As part of its Subpart S initiatives, EPA developed a draft advanced notice of proposed rulemaking (ANPRM) describing EPA's proposed approach to finalizing Subpart S. A copy of the ANPRM was provided to DOE for review and comment. EPA will submit a revised ANPRM to the Office of Management and Budget (OMB) for approval. Further, the Agency plans to formally propose the ANPRM in the *Federal Register* by December 21, 1995. In the Fall of 1997, EPA plans to finalize portions of the Subpart S regulations and at the same time repropose certain portions of the Subpart S program. The Agency plans to have all of Subpart S finalized by the Fall of 1998.

DOE's Office of Environmental Policy and Assistance, RCRA/CERCLA Division (EH-413), is tracking these regulatory developments. EH-413 will notify all Program and Field Offices at the time these rulemakings are proposed and will solicit comments from interested parties for consolidation into the official DOE response. This will be your opportunity to provide input to EPA and make your concerns known. For more information, contact Thomas Traceski (EH-413) at (202)586-2481, fax (202)586-3915, or e-mail [thomas.traceski@hq.doe.gov](mailto:thomas.traceski@hq.doe.gov).

## Environmental Regulatory Bulletin on a National Contingency Plan Final Rule Now Available

An environmental regulatory bulletin entitled *National Oil and Hazardous Substances Pollution Contingency Plan Revised Rule Issued* (dated July 31, 1995) was published by DOE's Office of Environmental Policy and Assistance, RCRA/CERCLA office (EH-413). One of the primary purposes of the revised National Contingency Plan (NCP) is to provide for efficient, coordinated, and effective action to minimize adverse impacts from oil discharges and hazardous substance releases. The NCP establishes an organizational structure and procedures for preparing for and responding to discharges of oil and releases of hazardous substances, pollutants, and contaminants under the Clean Water Act (CWA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The Oil Pollution Act (OPA) specifies several revisions to the NCP that enhance and expand upon the current framework, standards, and procedures for response.

Specific aspects of the revisions to the NCP that affect DOE programs and facilities include:

- Role of on-scene coordinators and remedial project managers.
- Response operations.
- Federal agency participation (particularly the EPA, U.S. Coast Guard and DOE).
- Natural resource trustee responsibilities.

The revised rule is required by the CWA, CERCLA, and OPA. For further information on the NCP revised rule, contact Katherine Nakata (EH-413) at (202)586-0801, fax (202)586-3915, or e-mail [katherine.nakata@hq.doe.gov](mailto:katherine.nakata@hq.doe.gov).



# EPA Progress on Streamlining CERCLA

## ENVIRONMENTAL RESTORATION ACTIVITIES FOR FEDERAL FACILITIES

Recently, the EPA distributed two documents examining its efforts to improve the national and site-specific decision-making process for CERCLA Environmental Restoration activities. The first EPA document, "Principles for Environmental Cleanup of Federal Facilities" developed by the EPA chartered Federal Facilities Environmental Restoration Dialogue Committee (FFERDC) seeks to develop consensus policy and recommendations aimed at improving the process by which federal facility environmental cleanup decisions are made.

The fourteen principles included in the FFERDC document address the Federal government's legal, ethical and moral obligation to cleanup environmental contamination; the need for the Federal government to make a sustained commitment to complete environmental cleanups at its facilities at a reasonable and defensible pace; a special emphasis upon environmental justice; the consistency of treatment between Federal facilities and private sites; and a need to recognize the highly interdependent roles and responsibilities of national and site-specific decision makers.

The second EPA document is a checklist developed by EPA, Region III to implement the Region's Superfund Accelerated Cleanup Model (SACM) Implementation Strategy. The goal of EPA's SACM is to streamline the Superfund process in order to make cleanups more timely and efficient.

The "SACM Criteria Form" developed by EPA, Region III allows a Screening Committee to rate each site as a potential SACM candidate. The rating criteria consists of five weighted factors.

Factor	Weight
(1) Risks Posed by the Site	30
(2) Early Action Potential	30
(3) Human Population Exposed/Potentially Exposed	25
(4) Threat to Sensitive Environments/ Food Chain	15

Region III has used this checklist to successfully accelerate several environmental cleanups. The Region III SACM Implementation Strategy is discussed in the EPA publication entitled: "SACM: Summary of Regional Pilot Projects," EPA, Office of Emergency and Remedial

Response, August, 1994, OSWER Directive Number, 9203.1-15, EPA document 540/R-94/042, and NTIS number PB94-963270. Further information on the Region III, SACM Implementation Strategy can be obtained from Cornelius Carr, EPA Region III, at (215)597-8182 or contact Katherine Nakata (EH-413) at (202)586-0801, fax (202)586-3915, or e-mail [katherine.nakata@hq.doe.gov](mailto:katherine.nakata@hq.doe.gov). For more information on the FFERDC principles for environmental cleanup of Federal Facilities, contact Suzanne Rudzinski (EM-4.1) at (202)586-4373, fax (202)586-9172.

## EH-41 RELEASES NEW ENVIRONMENTAL GUIDANCE DOCUMENTS

### PCB Guidance

A series of Information Briefs covering various management aspects of polychlorinated biphenyls (PCBs) under Toxic Substances Control Act (TSCA) have been released by DOE's Office of Environmental Policy and Assistance, RCRA/CERCLA Division (EH-413). These Information Briefs summarize the regulatory requirements for these aspects of PCB management pertinent to operations at DOE facilities. The five information briefs cover the following PCB management topics:

- *Disposal Requirements for PCB Waste* (EH-231-056/1294).
- *The PCB Mark* (EH-231-057/1294).
- *PCB Recordkeeping and Reporting* (EH-231-058/1294).
- *PCB Spill Response and Notification Requirements* (EH-231-059/1294).
- *PCB Storage Requirements* (EH-231-060).

A more complete discussion of all regulatory requirements applicable to PCB management is found in the document *Guidance on the Management of PCBs* (DOE/EH-0350, November, 1994). For information on PCB management topics, contact Carolyn Thompson Walder (EH-413) at (202)586-8248, or e-mail [carolyn.thompson@hq.doe.gov](mailto:carolyn.thompson@hq.doe.gov).

### Underground Storage Tank (UST) Guidance

EH-413 released a guidance document entitled *RCRA Corrective Action for Underground Storage Tanks Subtitle C or Subtitle I* in August 1995. The guidance document, using both narrative text and flow charts, provides the reader with a "regulatory roadmap" for determining whether RCRA 40 CFR Subtitle C or Subtitle I corrective action apply to the remediation of releases, based on a consideration of the content (petroleum, hazardous waste, etc.) and location (i.e., at a RCRA treatment, storage, and disposal facility, generator facility) of leaking underground storage tanks.

For information on corrective action requirements for releases from USTs, contact either Gerald DiCerbo (EH-413) at (202)586-5047 or e-mail [gerald.dicerbo@hq.doe.gov](mailto:gerald.dicerbo@hq.doe.gov) or Jerry Coalgate (EH-413) at (202)586-6075 or e-mail [jerry.coalgate@hq.doe.gov](mailto:jerry.coalgate@hq.doe.gov).

*Continued on page 10*

# WSSRAP Takes Time Out For Safety

What would you do when you see what appears to be a potentially unsafe work activity? **Take time out for safety**—that is what employees at the Weldon Spring Site Remedial Action Project (WSSRAP) do.



WSSRAP's Time Out for Safety program began in October 1994 when one employee asked why workers and supervisors hesitated to stop work to discuss and fix safety problems. The "time out" concept, now practiced sitewide, empowers employees to *pause* an activity without issuing a formal work stoppage. The hazard and its solution are discussed at the next day's "Plan of the Day" meeting, and lessons learned are distributed as appropriate.

Now, employee participation in dealing on the spot with workplace hazards is becoming routine, which has raised supervisor/employee communication to a new level and prevented on-the-job incidents. For example, during pump fueling, employees replaced a leaking fuel line to avoid a potential fire. Encouraged by such results, one subcontractor has presented the program to other company locations and made it the company picnic theme. For more information, contact Cami Bickmeyer (MK-Ferguson) at (314)441-8086.

## EPA Progress on Streamlining CERCLA continued from page 9

### Organic Air Emissions (Subpart CC)

The regulatory bulletin entitled *Organic Air Emission Standards; Final Rule Issued* furnishes a synopsis of the requirements of Hazardous Waste Treatment, Storage, and Disposal Facilities and Hazardous Waste Generators; Organic Air Emission Standards for Tanks, Surface Impoundments, and Containers (Subpart CC) Final Rule (59 FR 62896, December 6, 1994). The rule issued August 1995 by the Office of Environmental Policy and Analysis (OEPA), RCRA/CERCLA Division (EH-413), provides a background to the Subpart CC regulations, summaries of DOE comments on the proposed rule, as well as summaries of the requirements in the final rule for waste determinations, tank, surface impoundment, and container standards. For information on Subpart CC, or other RCRA organic air emissions (i.e., Subpart AA, BB), contact Jerry Coalgate (EH-413) at (202)586-6075, or e-mail [jerry.coalgate@hq.doe.gov](mailto:jerry.coalgate@hq.doe.gov).

Copies of the above guidance documents may be obtained from the Office of Scientific and Technical Information at (615)576-8401 or the Center for Environmental Management at 1-800-736-3282.

## ACRONYM LIST

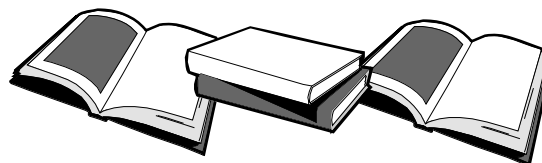
CAIRS	Computer Accident/Incident Reporting System
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CMA	Chemical Manufacturers Association
CWA	Clean Water Act
D&D	Decontamination and Decommissioning
DOE	Department of Energy
EH	Office of Environment, Safety and Health
EM	Office of Environmental Management
EPA	Environmental Protection Agency
ES&H	Environment, Safety and Health
FE	Office of Fossil Energy
HQ	Headquarters
INEL	Idaho National Engineering Laboratory
ISO	International Organization for Standardization
METC	Morgantown Energy Technology Center
NEPA	National Environmental Policy Act
NRC	Nuclear Regulatory Commission
NTIS	National Technical Information Service
OMB	Office of Management and Budget
OPA	Oil Pollution Act
ORPS	Occurrence Reporting and Processing System
OSHA	Occupational Safety and Health Administration
OSWER	Office of Emergency and Remedial Response
PNL	Pacific Northwest Laboratory
PUREX	Hanford Plutonium-Uranium Extraction
RCRA	Resource Conservation and Recovery Act
RESRAD	Residual Radioactive Material Guideline Code
RL	Richland Operations Office
SHIMS	Safety and Health Information Management System
TIS	Technical Information Services
TQM	Total Quality Management
TSCA	Toxic Substances Control Act
UST	Underground Storage Tank
VPP	Voluntary Protection Program
WHC	Westinghouse Hanford Company
WSSRAP	Weldon Spring Site Remedial Action Project



## CONFERENCES, MEETINGS, & WORKSHOPS

Title	When	Where	Contact
16th Annual Occupational Safety and Health Winter Institute	January 29-February 2, 1996	St. Petersburg Beach, FL	University of North Carolina (919)962-2101
Petro-Safe '96	January 30-February 1, 1996	Houston, TX	PenWell Conferences and Exhibitions Co. (713)621-9720
Annual Conference of the National Hearing Conservation Association	February 22-24, 1996	San Francisco, CA	National Hearing Conservation Assn. (414)276-6045
Waste Management (WM)'96	February 25-29, 1996	Tucson, AZ	WM Symposia, Inc. (520)624-8573
Health Industry Manufacturers Association Annual Meeting	March 17-20, 1996	Palm Beach, FL	HIMA (202)783-8700
American Chemical Society National Meeting	March 24-28, 1996	New Orleans, LA	American Chemical Society (202)872-4600
71st Annual Safety and Security Conference and Exhibit	March 26-28, 1996	Monroeville, PA	Western Pennsylvania Health Safety Council (412)856-5400
Safety Expo '96	April 16-18, 1996	Atlantic City, NJ	New Jersey State Safety Council (908)272-7712
American Occupational Health Conference	April 26-May 3, 1996	San Antonio, TX	Slack Inc. (609)848-1000

## UPCOMING TRAINING



Title	When	Where	Contact
Principles of Accident Investigation Workshops	January 1996	Knoxville, TN	Marcia Pratt (Lockheed Idaho) (208)526-1357
Readiness Team Training Workshops	January 1996	Knoxville, TN	Marcia Pratt (Lockheed Idaho) (208)526-1357

*(Editor's Note: Effective January 1, 1996, dynamic posting of training announcements will be available on the ES&H Technical Information Services (TIS) Web Site. The URL for TIS is <http://tis.eh.doe.gov>.)*



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